

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re

Chapter 9

CITY OF DETROIT, MICHIGAN,

Case No. 13-53846

Debtor.

Hon. Thomas J. Tucker

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**STIPULATION FOR ORDER WITHDRAWING ATU LOCAL 26  
CLAIM NOS. 937, 940, 941, 943, AND 944 AS MOOT**

The City of Detroit, Michigan (“City”) and the Amalgamated Transit Union, Local 26 (“ATU Local 26”), by and through their undersigned counsel, hereby stipulate to and state the following with regard to the withdrawal of ATU Local 26’s Claim Nos. 937, 940, 941, 943, and 944:

1. On February 20, 2014, ATU Local 26 filed Claim Nos. 937 and 940 through 944.
2. Claim Nos. 940 (Aaron Scott), 941 (Bernadette Brewer), 943 (Donald Rudd), and 944 (Mitchell Clifton) were filed on behalf of ATU Local 26 members with then-pending long-term disability grievances that have subsequently been resolved through mechanisms other than this municipal bankruptcy proceeding. Claim No. 937 is an omnibus claim filed by ATU Local 26 that encompasses each of these four

claims, plus additional claims that remain unresolved and *not* subject in their individual capacities to the instant stipulated withdrawal.<sup>1</sup>

3. The Plan of Adjustment was confirmed by this Court pursuant to its November 12, 2014 Order Confirming Eighth Amended Plan for the Adjustment of Debts of the City of Detroit [Docket No. 8272].
4. Claim Nos. 940, 941, 943, and 944 should be withdrawn as moot and, as a result of the withdrawal of Claim Nos. 940, 941, 943, and 944, ATU Local 26 will have no right to receive any distribution in these bankruptcy proceedings based on Claim Nos. 940, 941, 943, and 944 or based on their inclusion in Claim No. 937.

WHEREFORE, the parties request the Court enter an Order in the form attached hereto as Exhibit A.

STIPULATED AND AGREED:

ATU LOCAL 26 ATTORNEYS

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<sup>1</sup> Specifically, the ATU Local 26 claims that are encompassed within the omnibus claim (No. 937) but, as individual claims, are *not* subject to this stipulated withdrawal are Claim Nos. 936 (related to Good Friday holiday pay), 942 (Darryl Bates) and 945 (Bronte Kimbrough).

-and-

/s/ Jason McFarlane

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DATED: July 28, 2016